

17 Invertoise Drive
Port Colborne, Ontario
Canada L3K 5V5
Tel: 905-835-1203
Toll Free: 888-We-Reduce
Fax: 905-835-6824
www.rawmaterials.com



February 19, 2015

Via Courier

Mr. Joseph Martens, Commissioner
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Division of Environmental Remediation
Hazardous Waste Manifests and Reporting Section
625 Broadway, 12th Floor
Albany, New York
12233-7252

Dear Mr. Martens:

Re: NYSDEC Annual Report for EPA I.D. Number NYR000100891 – Universal Waste Exports for 2014 Calendar Year

Please find enclosed a copy of Raw Materials Co. Inc. Annual Report for the 2014 calendar year as required by 6NYCRR 374-3.3(k) and 6NYCRR 372.5(f).

Also enclosed is a copy of a letter from NYSDEC dated October 15th, 1998 stating the facilities report requirements.

If you require any additional information please feel free to contact me at our Toll Free number 1-888-937-3382

Sincerely,

Raw Materials Company Inc.

James Ewles
President

Encl. Annual Report
 NYSDEC letter dated October 15th, 1998

Cc. Mr. Scott Nelson
 Office of Enforcement and Compliance Assurance
 Office of Compliance, Enforcement Planning, Targeting and Data (2222A)
 ENVIRONMENTAL PROTECTION AGENCY
 1200 Penn Avenue NW, Ste. 6144
 Washington, DC
 20004

Raw-NYSDEC-2014 Universal Waste Export Annual Report-February 2015

received
SDM 2/23/2015



• HAZARDOUS WASTE RECYCLING • BATTERIES • ELECTRONICS • LAMPS • HEAVY METAL WASTE

ANNUAL REPORT – UNIVERSAL WASTE EXPORTS – CALENDAR YEAR 2014

To: **New York State Department of Environmental Conservation**
Division of Environmental Remediation
Hazardous Waste Manifest and Reporting Section
625 Broadway, 12th Floor
Albany, New York
12233-7252

And;

U.S. Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Compliance, Enforcement Planning, Targeting and Data Division (2222A)
1200 Penn Avenue NW, Ste. 6144
Washington, DC
20004

Exporter: **Raw Materials Company Inc.**

EPA I.D. Number:

NYR000100891

Exporting Address:

812 East Ferry Street
Buffalo, New York, USA
14211

Importer: **Raw Materials Company Inc.**

Receiving Address:

17 Invertose Drive
Port Colborne, Ontario, Canada
L3K 5V5

Mailing Address:

Ontario MOE Environmental Compliance

Approval Number:

A120316

Importer: **Tonolli Canada Ltd.**

Receiving Address:

133 Tonolli Road
Mississauga, Ontario, Canada

Mailing Address:

Same

Ontario MOE Certificate of

Approval Number:

A220129

Certification

Under penalty of the law, I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Signed:



Lori Spittal
Raw Materials Company Inc.

UNIVERSAL WASTE EXPORTS – SHIPMENT SUMMARY – CALENDAR YEAR 2014

Consignee for shipments:

Raw Materials Company Inc., 17 Invertose Drive, Port Colborne, Ontario, Canada
Tonolli Canada Ltd., 1333 Tonolli Road, Mississauga, Ontario, Canada

Description of Hazardous Waste	EPA HAZ. Waste No.	DOT Hazard Class No.	Total Shipments per Waste Stream 2014	Total Weight (lbs.) 2014	Total Weight (lbs.) 2013	Variance between years (=/-)
Waste Nickel Cadmium Batteries (Vented/Sealed)	D006	8	3	18,858	42,377	-23,519
Waste Nickel Metal Hydride Batteries	D002	8	1	1,479	9,074	-7,595
Waste Lithium Batteries	D003	9	5	3,117	3,974	-857
Waste Alkaline Batteries	D002	8	10	336,086	1,018,931	-682,845
Waste Lead Acid Batteries	D008	8	8	294,101	44,835	249,266
Waste Mercury, Contained in Equipment/Batteries	D009	8	0	0	0	0
Air Depolarized Zinc (Non Toxic) Batteries	D002	8	0	0	0	0
Silver Oxide Batteries	D011	8	0	0	0	0
Mercury Batteries	D009	8	1	7	0	7
Total Weights				653,642	1,119,191	-465,549
Total number of shipments for waste streams			28	-	43	-15

Transporters for 2013 Shipments:	
Transporter Name	Transporter Permit Number
Tonawanda Tank Transport Services Inc.	9A-080 (Haz. Materials Cert. of Registration No. 062513 552 065V)
Raw Materials Company Inc.	CD-098
Tonolli Canada Inc.	N/A
J. Syvret	N/A

**New York State Department of Environmental Conservation
Hazardous Waste Report
Site Identification Form
Calendar Year Being Reported - 2014**

1. Site EPA ID Number	EPA ID Number <u>NY 0 0 0 1 0 0 8 9 1</u>		
2. Site Name	Name: Raw Materials Company Inc.		
3. Site Location Information	Street Address: 812 East Ferry Street		
	City, Town, Village: Buffalo		County Code: Erie
	State: New York		Zip Code: 14211
4. Site Land Type	<input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State		
5. NAICS Codes for the Site: (enter at least a 5 digit code)	A. <u>4 9 3 1 9</u>		B. <u> </u>
	C. <u> </u>		D. <u> </u>
6. Site Mailing Address	Street or P.O. Box: 17 Invertose Drive		
	City, Town, Village: Port Colborne		
	State: Ontario	Country: Canada	Zip Code: L3K 5V5
7. Site Contact Person	First Name: James		MI:
	Last: Ewles		
	Title: President		
	Street or P.O. Box: 17 Invertose Drive		
	City, Town, Village: Port Colborne		
	State: Ontario	Country: Canada	Zip Code: L3K 5V5
	Email: jewles@rawmaterials.com		
	Phone: (905) 835-1203	Ext: 226	Fax: (905) 835-6824
8. Legal Owner of the Site	Name of Site's Legal Owner: KBSD, LLC		Date Became Owner: Mar. 8, 2011
	<input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State		
	Street or P.O. Box: 1352 Genesee Street		
	City, Town, Village: Buffalo		Phone: (716) 332-4068
	State: New York	Country: U.S.A.	Zip Code: 14211
9. Legal Operator of the Site	Name of Site's Operator Raw Materials Company Inc.		Date Became Operator: Oct. 2001
	<input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State		

10. Type of Regulated Waste Activity

Mark "Y" or "N" for all current activities (as of the date submitting this form); complete any additional boxes as instructed.

A. Current Hazardous Waste Activities; Complete all parts 1 -7.Y ☐ N ☒ 1. Generator of Hazardous Waste
If "Yes", mark only one of the following - a, b, or c.☐ a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs/mo) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs/mo) of acute hazardous waste; or Generates, in calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs/mo) of acute hazardous spill cleanup material.☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs/mo) of non-acute hazardous waste.☐ c. CESQG: Less than 100 kg/mo (220 lbs/mo) of non-acute hazardous waste.Y ☐ N ☒ d. United States Importer of Hazardous WasteY ☐ N ☒ e. Mixed Waste (hazardous and radioactive) GeneratorY ☐ N ☒ 2. Transporter of Hazardous Waste
If "Yes", mark all that apply.☐ a. Transporter☐ b. Transfer Facility (at your site)Y ☐ N ☒ 3. Treater, Storer, or Disposer of Hazardous Waste Note: a hazardous waste permit is required for these activities.Y ☐ N ☒ 4. Recycler of Hazardous WasteY ☐ N ☒ 5. Exempt Boiler and/or Industrial Furnace
If "Yes", mark all that apply☐ a. Small Quantity On-site Burner Exemption☐ b. Smelting, Melting, and Furnace ExemptionY ☐ N ☒ 6. Underground Injection ControlY ☐ N ☒ 7. Receives Hazardous Waste from Off-Site**B. Universal Waste Activities; Complete all parts 1 - 2**Y ☒ N ☐ 1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more of any universal wastes at any time) Indicate types of universal waste managed at your site. If "Yes", mark all that apply.☒ a. Batteries☐ b. Pesticides☒ c. Mercury containing equipment☒ d. LampsY ☐ N ☒ 2. Destination Facility for Universal Waste
Note: A hazardous waste permit may be required for this activity.**C. Used Oil Activities; Complete all parts 1 -4**Y ☐ N ☒ 1. Used Oil Transporter
If "Yes", mark all that apply.☐ a. Transporter☐ b. Transfer Facility (at your site)Y ☐ N ☒ 2. Used Oil Processor and/or Re-refiner
If "Yes", mark all that apply.☐ a. Processor☐ b. Re-refinerY ☐ N ☒ 3. Off-Specification Used Oil BurnerY ☐ N ☒ 4. Used Oil Fuel Marketer
If "Yes", mark all that apply.☐ a. Marketer Who Directs Shipment of Off-Specification used Oil to Off-Specification Used Oil Burner☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

11. Comments

12. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.


Signature of legal owner, operator, or their authorized representative

Name and Official Title (please print)

Date Signed
(mm/dd/yyyy)

Lori Spittal, Environmental Management Representative

02/19/2015


New York State Department of Environmental Conservation
Division of Solid and Hazardous Materials
Bureau of Hazardous Waste Management, Room 440
80 Wolf Road, Albany, New York 12233-7251
Phone: (518) 487-9257 FAX: (518) 406-0700



OCT 15 1998

Mr. Rick Unyl
Raw Materials Corporation
P.O. Box 6
Inverose Drive
Port Colborne, Ontario Canada L3K5V7

Dear Mr. Unyl:

This is in response to your September 17, 1998 letter concerning a request for information on the regulatory applicability, to Universal Waste Handlers (UWH), of various reporting requirements of RCRA Subtitle C. Your letter asks for a determination of applicability to UWHs of regular annual reporting.

If the only wastes managed by Raw Materials Corp. are universal waste and exempt scrap metal, the reporting requirements for hazardous waste outlined at 6NYCRR 372.2(c)(2) are not applicable. The Universal Waste Rule is an alternative management regulation which manages hazardous waste independently of other, more standard hazardous waste regulations. Universal wastes are not subject to 6NYCRR Part 372 reporting requirements for generators. Scrap metal being recycled is not subject to 6NYCRR Part 372 requirements at all.

Reporting requirements that would be applicable to your activities are for universal waste exports. 6NYCRR 374.3.3(k) requirements for exports, and the reference to NYCRR 372.5(f) requirements for reporting those exports, remain applicable. No reporting is required for exports of hazardous scrap metal being recycled.

If you have any further questions, please contact John Miccoli of my staff at (518) 485-8988.

Sincerely,

Lawrence J. Nadler

Lawrence Nadler
Chief
Technical Determination Section
Bureau of Hazardous Waste Management
Division of Solid & Hazardous Materials

cc: J. Miccoli

RECEIVED OCT 26

From: (905) 835-1203
Spring Cassidy
RAW Materials
17 Invertose Dr

Origin ID: YCMA



J151015011084W

Port Colborne, ON L3K5V5
CANADA

SHIP TO: (202) 564-2290

BILL SENDER

Mr. Scott Nelson
Environmental Protection Agency
Office of Enforcement & Compliance
1200 Penn Avenue NW, Ste 6144

WASHINGTON, DC 20004
US

Ship Date: 19FEB15
ActWgt: 1.0 LB
CAD: 103591146/INCA3610

Dims: 8 X 11 X 1 IN

REF:
DESC-1: Correspondence/No Customs Value
DESC-2:
DESC-3:
DESC-4:

COUNTRY MFG: CA
CARRIAGE VALUE: 0.00 CAD
CUSTOMS VALUE: 0.00 CAD

SIGN: Spring Cassidy
EIN/VAT:
PKG TYPE: CUSTOMER

10:30A

INTL PRIORITY

TRK# 7729 4401 1948

0430

20004

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 Spring Cassidy
 RAW Materials
 17 Invertose Dr

Origin ID: YCMA

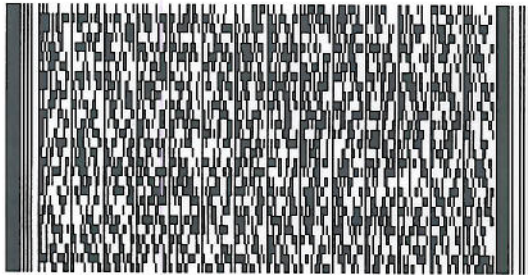


J151015011-00100

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 DESC-4:

COUNTRY MFG: CA
 CARRIAGE VALUE: 0.00 CAD
 CUSTOMS VALUE: 0.00 CAD
 T/C: S 316983537 D/T: S 316983537
 SIGN: Spring Cassidy
 EIN/VAT:
 PKG TYPE: CUSTOMER

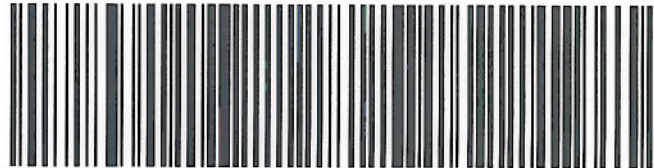
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